

January 23, 2009

Carole Davis
Co-Executive Secretary of the Dietary Guidelines Advisory Committee
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Ms. Davis:

Prevention Institute is a non-profit national center dedicated to improving community health and well-being by building momentum for effective primary prevention. Primary prevention means taking action to build resilience and to prevent problems before they occur. The Institute's work is characterized by a strong commitment to community participation and promotion of equitable health outcomes among all social and economic groups. Since its founding in 1997, food and nutrition has been a primary focus area of the Institute's work.

As the 2010 Dietary Guidelines Advisory Committee begins its revision process, Prevention Institute would like recommend that, in addition to considering the evidence related to the health impacts of specific nutrients and food groups, the Committee also review the evidence related to food production, processing, and transport and the impact that these factors have on individual and community health.

The relationship between food and health is not limited to the nutrients that foods contain. The food system as a whole impacts human health in many ways, both directly and indirectly. Industrial agricultural methods depend heavily on immense quantities of fossil-fuel based pesticides and fertilizers, non-therapeutic antibiotics, and hormones to accelerate crop and animal growth. These methods along with concentrated animal farming operations are putting the environment, farmers, agricultural workers and residents in agricultural communities at risk – polluting air, water and soil and contributing to asthma, cancer, birth defects, and neurological disorders. Fossil fuels, which are relied upon to grow and transport our nation's food supply, contribute more greenhouse gases to the atmosphere than any other industry or activity; produce now travels an average of 1500 miles to reach our plates. Small and mid-size farmers are struggling to survive — farming families are twice as likely to live in poverty compared to the general U.S. population and are often compelled to pursue additional employment in order to stay out of debt. The food system is broken and must be fixed so that it can produce food that is supports the health of everyone.

Prevention Institute has developed a set of principles that support a comprehensive definition of healthy food. We believe these principles provide a framework for health and nutrition professionals to use in developing programs, shaping community food systems, and advocating for food policies which truly promote health. We would like to recommend the 2010 Dietary Guidelines Advisory Committee take these principles under consideration as key priorities of the 2010 Guidelines. We would be pleased to discuss our recommendations further and look forward to the Committee's findings.

Healthy Food is wholesome.

- Healthy food is minimally processed fruits, vegetables, whole grains, legumes, nuts, seeds, eggs, milk, meats, fish, and poultry.
- Healthy food has naturally occurring nutrients (e.g., vitamins, minerals, phyto-nutrients).
- Healthy food has no artificial colors or flavors, added hormones, antibiotics, or unnecessary preservatives.

Healthy Food is produced, processed, and transported in a way that prevents the exploitation of farmers, workers, natural resources, and the cruel treatment of animals.

- Upholds the dignity, safety, and quality of life for all who work to feed us.
- Treats all animals humanely.
- Protects the finite resources of soil, water, air, and biological diversity.
- Supports local and regional farm and food economies.
- Replaces fossil fuels with renewable energy sources.

Healthy Food should be available, accessible, and affordable to everyone.

- Distributed equitably among all communities.
- Available and emphasized in children's environments such as childcare, school, and after-school settings.
- Promoted within institutions and workplaces, in cafeterias, vending machines, and at meetings and events.
- Reflective of the natural diversity found in traditions and cultures.

Sincerely,
Juliet Sims, RD, MPH
Program Coordinator